



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C., 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

March 12, 2019

Re: Approval Regarding Project Plan Documentation for Humphreys and Harmon Creek Supplemental Environmental Projects (SEPs)

Dear Mr. Rimkus,

Pursuant to our Consent Decree¹, MarkWest submitted to the United States Environmental Protection Agency (EPA) Monitoring Project Plan documentation for the Humphreys Compressor Station (Humphreys) SEP² on November 2, 2018, and the Harmon Creek Processing Plant (Harmon Creek) SEP³ on November 6, 2018. MarkWest sought EPA approval of these submittals as consistent with Consent Decree Paragraphs 28(b) and 28(c), and Appendices 7 and 8, and EPA has finalized its review of these submittals.

After review, EPA *conditionally approves* of the Humphreys SEP documentation pursuant to Paragraph 28(b) of the Consent Decree. EPA requests that Table 2 (page 10) of the Humphreys Quality Assurance Project Plan (QAPP) be updated to reflect that EPA does not have specific staff designated to perform the role of QA Manager nor is EPA required to perform this function pursuant to the Consent Decree, and therefore recommends that EPA collectively be assigned to review and approve the QAPP only. In response to this approval, MarkWest shall take all actions required by the approved Humphreys SEP documentation, in accordance with the schedules and requirements of this documentation. EPA understands that the documentation will be minimally revised to include the requested update. Therefore, EPA requests that MarkWest submit a final version of the documentation to EPA for final review prior to actual implementation of the project.

Upon review and in consultation with the Pennsylvania Department of Environmental Protection (PADEP), EPA *conditionally approves* the Harmon Creek SEP documentation pursuant to paragraph 28(c) of the Consent Decree. Conditional approval is granted with the additional requirement that MarkWest, within 45 days or such other time as the parties agree to in writing, correct all deficiencies identified in Attachment 1, and resubmit the revised documentation to EPA and PADEP. Resubmission of the revised documentation shall include a reference(s) to all revisions made in response to the deficiencies detailed in Attachment 1. If the resubmission is approved in whole, MarkWest shall proceed in accordance with the schedules and requirements of the resubmitted Harmon Creek SEP documentation.

If you have any questions regarding EPA's review of this submittal, or wish to request a meeting in response to this letter, you may contact Christopher Williams at 202-564-7889 or [HYPERLINK "mailto:williams.christopher@epa.gov"].

Sincerely,

Kathryn Pirrotta Caballero
Senior Attorney
U.S. EPA Office of Civil Enforcement
Air Enforcement Division

Enclosure:

Attachment 1 - US Environmental Protection Agency (EPA) Region 3 and Pennsylvania Department of Environmental Protection (PADEP) comments for MarkWest Harmon Creek Processing Plant Volatile Organic Compound (VOC) QAPP related to the MarkWest Consent Decree (no. 2:18-cv-00520-LPL).

cc: Mark R. Gorog, P.E., PADEP
Lori McNabb, PADEP
Michael Heilman, PADEP
Mark Elmer, DOJ
Doug Snyder, EPA Region 3
Mary McAuliffe, EPA Region 5

¹ *United States of America and Commonwealth of Pennsylvania Department of Environmental Protection vs. MarkWest Liberty Midstream & Resources, L.L.C., and Ohio Gathering Company, L.L.C.*, No. 2:18-cv-00520-LPL (W.D. Pa. entered July 9, 2018).

² Documentation prepared by Sonoma Technologies Inc. entitled *Air Quality Monitoring Plan for Humphreys Compressor Station (Barnesville, Ohio)* dated: October 31, 2018, and *Quality Assurance Project Plan (QAPP) Humphreys Compressor Station Ambient Air Monitoring*, October 31, 2018, Version: 1.0.

³ Documentation prepared by Trinity Consultants MSI entitled *Monitoring & Quality Management Plan/Quality Assurance Project Plan for MarkWest's Harmon Creek Processing Plant Air Toxics Monitoring Stations*, November 1, 2018, Revision: 0.